

1 Law Offices of Travis Gagnier, Inc., P.S.
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Honorable Timothy W. Dore

6 IN THE UNITED STATES BANKRUPTCY COURT
7 FOR THE WESTERN DISTRICT OF WASHINGTON

8 **STENSGAARD, Lisa Marie,**

9 Debtor.

10 **STENSGAARD, Lisa Marie,**

11 Plaintiff,

12 v.

13 **UNITED STATES OF AMERICA
14 ACTING THROUGH THE U.S.
15 DEPARTMENT OF EDUCATION,**

16 Defendant.

Number 19-11116

Adversary Number: 23-01007

***ExParte* SECOND MOTION TO
EXTEND ORDER SUSPENDING PRE-
TRIAL DEADLINES AND TRIAL
DATE IN ADVERSARY PROCEEDING**

17 Plaintiff Lisa Marie Stensgaard and Defendant Department of Education (“DOE”), by
18 and through their undersigned counsel of record, jointly move the Court for a Second Order
19 Suspending Entry of Pre-Trial Deadlines and Trial Date in Adversary Proceeding.

20 This motion is based upon the files and records herein and the Declaration of Travis A. Gagnier.

21 Dated this 21st day of June 2023.

22 Law Offices of Travis Gagnier, Inc., P.S.
23 Attorneys for Plaintiff

24 /s/ Travis A. Gagnier
25 Travis A. Gagnier, WSBA #26379
26 Gregory Jalbert, WSBA #9440
27 Of Counsel

28 AND

ExParte SECOND MOTION TO EXTEND ORDER SUSPENDING
PRE-TRIAL DEADLINES AND TRIAL DATE IN ADVERSARY
PROCEEDING- 1

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1 United States Department of Justice

2 By: /s/ Kyle A. Forsyth
3 Kyle A. Forsyth, WSBA #34609
4 Assistant United States Attorney
5 U.S. Department of Justice
6 Western District of Washington
7 700 Stewart Street, Suite 5220
8 Seattle, WA 98101
9 kyle.forsyth@usdoj.gov
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11

12 **DECLARATION**

13 Travis A. Gagnier, under penalty of perjury does hereby state the following:

- 14 1. That your declarant is over the age of 18 and competent to testify as to the matters set forth
15 herein.
16
17 2. That I am the attorney that represents the Plaintiff in this above-entitled adversary
18 proceeding.
19
20 3. That the Plaintiff has submitted an Attestation to the U.S. Attorney's office in order to for the
21 Department of Education to determine if this matter can be resolved under the DOJ/DOE
22 guidance issued in November 2022.
23
24 4. That an Order Suspending Entry of Pre-Trial Deadlines and Trial Date in Adversary
25 Proceeding was entered by this Court on March 20, 2023 (doc 8) requiring the parties to send
26 a joint letter to the Court by June 30, 2023 reporting that no settlement has been reached and
27 asking for the deadlines and trial date to be set.
28
5. Your declarant is advised that a decision should be made on this matter by the Department of
Education in the next 60 days or so. Thus, the parties are requesting a suspension of entry of
Pre-Trial Deadlines and Trial Date until August 18, 2023.

1 WHEREFORE, your declarant prays for entry of a Second Order Extending Suspension of Pre-
2 Trial Deadlines and Trial Date in Adversary Proceeding.

3 Dated this 21st day of June 2023

4 /s/ Travis A. Gagnier

5 Travis A. Gagnier, WSBA #26379
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